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 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b),)	MB Docket No. 02-335
Table of Allotments,)	RM-10545
FM Broadcast Stations.)	
(Hart, Pentwater, Coopersville, Alpena,)	
Beaverton, Cheboygan, Frankfort, Garfield)	
Township, Glen Arbor and)	
Standish, Michigan))	

To. Assistant Chief, Audio Division, Media Bureau

JOINT REPLY COMMENTS

Waters Broadcasting Corporation ("Waters") and Synergy Media, Inc. ("Synergy") (jointly, "the Petitioners") herein submit their reply comments with respect to (a) their proposal set forth in the *Notice of Proposed Rule Making*, DA 02-2721 (released November 8, 2002) ("*NPRM*") and (b) the counterproposal of Fort Bend Broadcasting Company ("Fort Bend").

Through its counterproposal, Fort Bend proposes several amendments to the Table of Allotments with the objective of upgrading **WBNZ** (FM), Frankfort, Michigan, from Channel 257C2 to Channel 257C1 and changing its community of license to Garfield Township, Michigan. Among the various changes necessary to effectuate Fort Bend's plan is the substitution of Channel 287A **for** Channel 227A at Glen Arbor, Michigan. That substitution is

¹ The communities of Alpena, Beaverton, Cheboygan, Frankfort, Garfield Township, Glen Arbor and Standish have been added to the caption.

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mutually exclusive with the allotment of Channel **287B** at Coopersville, Michigan, using the reference point the Petitioners originally proposed.

But as Fort Bend notes, allotment of Channel **287A** at Glen Arbor does not preclude initiation of a first local service at Coopersville. All that is necessary is the specification of a different reference point for the Coopersville allotment. Fort Bend proposes **NL 43-17-46, WL 85-59-57** (hereinafter “Fort Bend’s Site”).

The Petitioners have no objection to adoption of Fort Bend’s allotment plan but suggest specification of another reference point for Coopersville: **NL 43-17-20, WL 86-02-51** (hereinafter “Petitioners’ Alternate Site”). This location would not conflict with the proposed coordinates for Channel **287A** at Glen Arbor. See Engineering Report of Munn-Reese, Inc. attached hereto (hereinafter “Munn-Reese Report”) at Exhibit **2.3**. Furthermore, use of this reference point would avoid issues that might be raised regarding the coordinates Fort Bend suggested.

The Petitioners’ review of Fort Bend’s proposal raised a concern as to whether Fort Bend’s Site is situated in the Muskegon State Game Area. See Munn-Reese Report at p.1 and Exhibit 1.1. Frankly, the Petitioners do not know if construction of a broadcast tower in a state game area is categorically precluded. But it is unnecessary to delve into that matter because other clearly suitable locations exist, including the Petitioners’ Alternate Site.

The Petitioners' Alternate Site also has the advantage of increasing the separation between the Coopersville allotment site and the site specified in the application to modify the facilities of Station WOOD-FM, Grand Rapids, Michigan (BPH-20020930ABY), which was filed after the Petitioners filed their Petition *for* Rule Making.'

From Petitioners' Alternate Site, as from Fort Bend's Site, the proposed station on Channel 287C2 would place a city-grade signal over all of Coopersville.

Adoption of the reference coordinates the Petitioners now suggest clearly is consistent with Commission precedent. The Commission frequently has specified coordinates other than those originally proposed in order to accommodate otherwise mutually exclusive proposals. *E.g.*, ***Detroit Lakes, Minnesota***, DA 02-3364, ¶ 7 & n. 9 (Media Bur., released December 16, 2002); ***Sister Bay, Wisconsin***, 15 FCC Rcd 22455 (MM Bur. 2000); *see* ***Topsail Beach, North Carolina***, 3 FCC Rcd 3129 (MM Bur. 1988). Furthermore, the Petitioners' suggestion that its allotment plan be adjusted to specify a different reference point for Coopersville does not constitute an untimely counterproposal. *E.g.*, ***Moncks Corner, South Carolina***, 15 FCC Rcd 8973, ¶¶ 7-8 (MM

² By way of background, WOOD-FM's modification application, relying on the spacing provisions of Section 73.215 *of* the Commission's Rules, specifies a site 68.34 kilometers **from** the Coopersville reference point the Petitioners originally proposed. The WOOD-FM application, through use of a directional pattern, fully protects that location. Fort Bend's Site is located 69.56 kilometers from the proposed WOOD-FM site and reasonably could be expected not to conflict with the WOOD-FM proposed facilities. But it appears a small area of contour overlap exists. *See* Munn-Reese Report at Exhibit 1.2. The Petitioners' Alternate Site, located 71.42 kilometers from the proposed WOOD-FM site, would not conflict with WOOD-FM's proposed facilities. *Id.* at Exhibit 2.2. Since WOOD-FM still would be able to obtain a grant of its Section 73.215 modification application, the Coopersville proposal, as adjusted herein or as originally proposed, may be adopted as a fully spaced allotment. ***Ankeny, Iowa***, 15 FCC Rcd 4413 (MM Bur. 2000).

Bur. 1988), *citing Homerville, Georgia*, 8 FCC Rcd 2953,2954 (MM Bur. 1993) and *Rockport, Texas*, 4 FCC Rcd 8075,8076 (MM Bur. 1989).

Operating from the Petitioners' Alternate Site, WCXT will provide primary service to a population of 1,118,671 persons in an area of 10,368 square kilometers. The gain area covers 5,972 square kilometers with a population of 934,330 persons. Thus, implementation of the proposal will mean more than a 400% increase in population within the station's primary service contour (from 215,696 presently to 1,118,671). With the transition of WCXT from Class C2 to Class B status, the total area within the station's primary contour will increase nearly 75% (from 5,947.1 square kilometers presently to 10,368 square kilometers). The area that will lose primary service from WCXT (1,551.1 square kilometers with a population of 31,355 persons) is served by five or more other aural services. *See* Munn-Reese Report at Exhibit 3.1.

The difference in WCXT's coverage from the Petitioners' originally proposed reference point and the Petitioners' Alternate Site is minimal. For the original site, the loss area was only very slightly smaller (1,459.8 square kilometers with a population 30,544, a difference of 91.3 kilometers and 911 persons). On the other hand, the gain area population is slightly larger from the Petitioners' Alternate Site (934,330 versus 930,977, a difference of 3,353). *See* Exhibit 2.0 of Engineering Report attached to the Petitioners' Petition for Rulemaking

While Coopersville is located outside of any Census Bureau-designated Urbanized Area, the 70 dbu contour of WCXT from the Petitioners' Alternate Site will cover all of the Muskegon Urbanized Area. *See* Munn-Reese Report at p.2. Under these circumstances, adoption of the

Petitioners' Alternate Site would trigger the need to demonstrate, using the criteria listed in *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988), that Coopersville is independent of Muskegon. *E.g.*, *Headland Alabama* and *Chattahoochee, Florida* 10 FCC Rcd 10,352 (1995). Although not required to do *so* at the time, the Petitioners submitted such a showing in their Petition for Rulemaking filed February 15, 2002. That showing, as the *NPRM* acknowledged, did indeed demonstrate that Coopersville is an independent community. *NPRM* at n.4. **As** such, it is well deserving of its first local broadcast service.

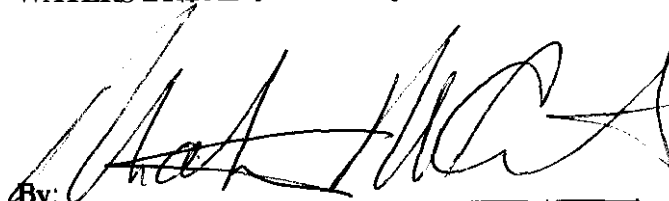
Petitioners reiterate their commitment to file applications for the allotments proposed, regardless of what reference point **for** Coopersville ultimately is specified. If the Petitioners' proposal is adopted, Waters promptly will file an application for a construction permit to modify the facilities of Station WCXT to operate on Channel 287B at Coopersville, Michigan and, upon grant of that construction permit application, promptly will construct and begin operation of the new facilities. **Synergy**, likewise, promptly will file an application to modify the facilities of Station WWKR to operate on Channel 231C3 at Hart, Michigan, and promptly begin operation as a Hart station.'

³ Of course, the modification of WWKR does not require a change in the technical facilities of the station.

WHEREFORE, in light of all circumstances present, the Commission should promptly adopt the Petitioners' proposal.


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By: 
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Its Counsel

January 15, 2003

ENGINEERING REPORT

**Supplemental Showings
on behalf of the
Petition for Rulemaking**

DA No. 02-2721 / MB Docket No. 02-335 / RM-10545

**Coopersville, MI
Hart, MI
Pentwater, MI**

January, 2003

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Broadcast Engineering Consultants
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STATEMENT OF ENGINEERS

The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 100 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report.

The data utilized in this report was taken from the FCC Secondary Database and data on file. While this information is believed accurate, errors or omissions in the database and file data are possible. This firm may not be held liable for damages as a result of such data errors or omissions.


The report has been prepared by properly trained electronics specialists under the direction of the undersigned whose qualifications are a matter of record before the Federal Communications Commission.

I declare under penalty of the laws perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

January 10, 2003

MUNN-REESE, INC.

By



Wayne S. Reese, President

By



Justin W. Asher, Project Engineer

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ENGINEERING STATEMENT

In Support of a Petition to Amend §73.202(b)

The office of Munn-Reese, Inc. has been retained by Waters Broadcasting Corporation and Synergy Media, Inc. (the "Petitioners") to prepare this supplemental showing in support of a petition to amend 47 C.F.R. §73.202(b), the FM Table of Allotments in DA No. 02-2721, MB Docket No. 02-335, RM-10545.

The Petitioners have proposed the following amendments to the FM Table of Allotments: (1) reallocation of Channel 287C2, 105.3 MHz, Hart, MI to Channel 287B, 105.3 MHz, Coopersville, MI and reservation of that allotment for the licensee of Station WCXT, using a special reference point and (2) the reallocation of Channel 231C3, 94.1 MHz, Pentwater, MI to Channel 231C3 Hart, MI and reservation of that allotment for the licensee of Station WWKR. using the present WWKR site as the proposed reference point.' As a result of this proposed rulemaking, Coopersville, MI will be allotted its first aural service. Hart, MI and Pentwater both will continue to have an aural service allotted to their respective communities.

Fort Bend Broadcasting has filed a counterproposal to RM-10545. As part of its counterproposal, Fort Bend has requested an alternate reference point for the proposed Coopersville allotment. While the Petitioners are not opposed to modifying the reference point for Channel 287B for Coopersville, they believe there may be a more suitable alternate reference point than the one suggested by Fort Bend. The Petitioners' alternate reference point will allow adoption of both the Petitioners' original rulemaking proposal and the Fort Bend counterproposal.

Fort Bend's Proposed Coopersville Reference Point. Fort Bend's proposed Coopersville reference point of 43° 17' 46" N, 85° 59' 57" W has been evaluated. There is some question as to whether the alternate reference point might be located within the Muskegon State Game Area. Topographic mapping for the area, shown in **Exhibit 1.1**, indicates the site is within the game area, however, this has not been confirmed by other mapping software or topographical maps. While it might be possible to locate a tower in a state game area, the Petitioners believe it would be advantageous and prudent to find a location that is clearly outside of the game area as shown by multiple mapping resources. The Petitioners' alternate site is such a location.

Subsequent to the filing of the Petitioners' rulemaking proposal, the licensee of WOOD-FM, Grand Rapids, MI, filed a modification application, **BPH-20020930ABY**, relying on the spacing provisions of §73.215. The transmitter site proposed in the WOOD-FM modification is 68.34 kilometers from the reference point the Petitioners' originally proposed for the Coopersville allotment. The Coopersville reference point proposed by Fort Bend increases the spacing from the WOOD-FM application site to 69.56 kilometers, but appears not to provide contour protection to the WOOD-FM application. **Exhibit 7.2** is a map showing contour overlap from the Fort Bend reference point to the WOOD-FM application, based on a full Class B facility at the reference point. A tabulation of the allocation spacing from the Fort Bend reference point is shown in **Exhibit 7.3**.

¹ In their Comments, Petitioners pointed out that a site exists from which Channel 231C3 at Hart, MI would be fully spaced under §73.207(b) and provide Hart the requisite city coverage.

Petitioners' Alternate Coopersville Reference Point. The Petitioners' proposed alternate reference point would permit adoption of the Petitioners' Coopersville proposal and the Fort Bend counterproposal while simultaneously providing increased spacing and contour protection to the WOOD-FM application. This point is located at 43° 17' 20" NL; 86° 02' 51" WL. A map of this site has been included in **Exhibit 2.7**. The supplemental map, shown as **Exhibit 2.1a**, clearly shows the site to be outside the Muskegon State Game Area. From this location, the WOOD-FM Application is offered full contour protection as seen in **Exhibit 2.2**. The map shows there would be no contour overlap from this site. A tabulation of the allocation spacing from this site has been included in **Exhibit 2.3**. **Exhibit 2.3** also shows that the spacing to the WOOD-FM application site would be increased to 71.42 kilometers. The Petitioners' alternate reference point places Coopersville well within the 32.6 km city coverage arc for Class B operation. The Muskegon Urbanized Area resides within the city coverage arc as well.

A revised gain-loss study for the Petitioners' alternate reference point has been attached as **Exhibit(s) 3.1 to 3.2**. Both the revised gain and loss areas remain fully served with five (5) or more aural services as calculated in the previous RM-10545 showings.

The Petitioners wish to restate their desire to actively pursue RM-10545. The Petitioners believe the requested changes will allow a grant of the Coopersville rulemaking and the Fort Bend counterproposal.

The Petitioners reiterate their request that 47 C.F.R. §73.202(b) be amended as follows:

COMMUNITY	PRESENT	PROPOSED
Coopersville, MI	- - -	287B
Hart, MI	287C2	231C3
Pentwater, MI	231C3, 274A, 280A	274A, 280A

Exhibit 1.1 - Fort Bend Reference Paint

Site Location: 43° 17' 46"N, 85° 59' 57"W



Exhibit 1.2 - Contour Study with WOOD-FM.A

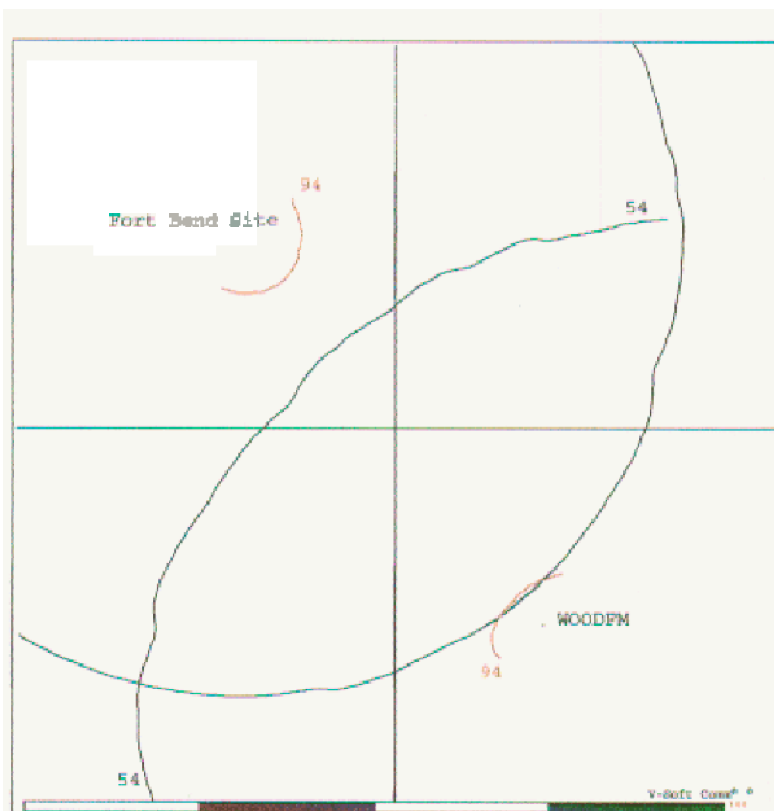
FMCONT Allocation Study

01-03-2003

Fort Bend Site CH 287 B
50 kW 361M COR
Prot. = 54 dBu
Intef. = 94 dBu

WOODFM.A CH 289 B
50kW, 375 M COR DA
Prot. = 54 dBu
Intef. = 94 dBu

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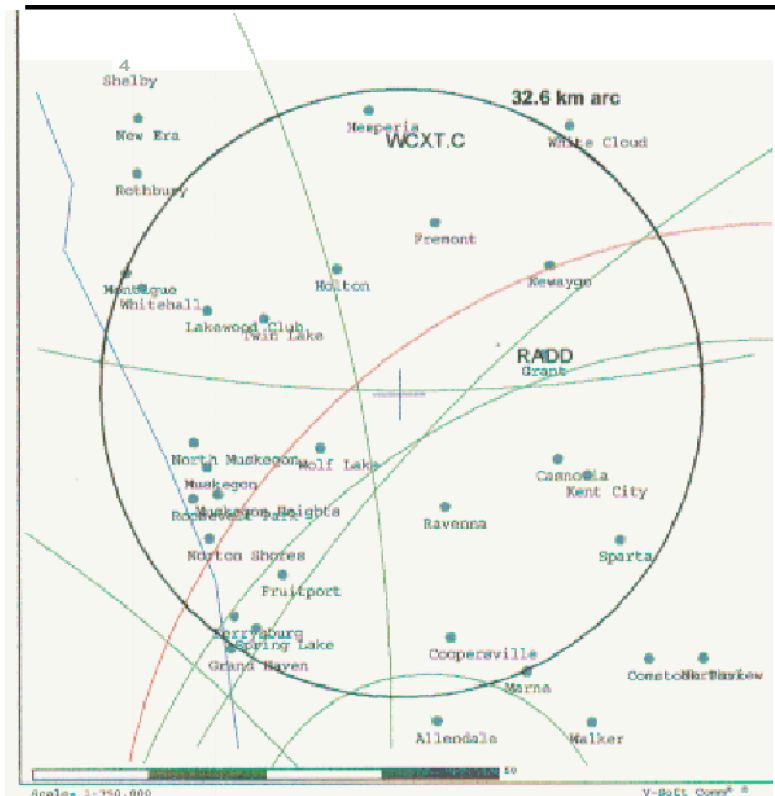


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FMCONTTM LOCATE STUDY

Ch 237 B
105.3 MHz

N. Lat. 43 17 46
W. Long. 85 59 57



Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
RADD	287B	- ADD	Coopersville	MI	11.64	63.1	240.5	-228.86
WCXT.C	287C2-	CP	Hart	MI	28.43	352.9	240.5	-212.07
WCXT	287C2-	LIC	Hart	MI	46.46	335.5	240.5	-194.04
RDEL	287C2-	DEL	Hart	MI	46.47	335.5	240.5	-194.03
WOODFA*289B	- APP	Grand Rapids	MI	69.56	142.4	73.5		-3.94
RADD**	287A	- ADD	Glen Arbor	MI	177.91	0.4	177.5	0.41
WFZH	287A	- LIC	Mukwonago	WI	181.86	259.1	177.5	4.36
WKHMF	287A	- LIC	Brooklyn	MI	182.25	133.7	177.5	4.75
WOODFM	289B	- LIC	Grand Rapids	MI	78.57	149.4	73.5	5.07
WKLQ	233B	- LIC	Holland	MI	49.03	176.5	19.5	29.53
WOJO	286B	- LIC	Evanston	IL	204.58	221.1	168.5	36.08
WOJO.C	286B	- CP	Evanston	IL	204.58	221.1	168.5	36.08
WQBX	285A	- LIC	Alma	MI	113.34	85.4	68.5	44.84
WQBX.C	285A	- CP	Alma	MI	113.34	85.4	68.5	44.84
WWCKFM	288B1-	LIC	Flint	MI	193.60	98.7	144.5	49.10
WBMI	288A	- LIC	West Branch	MI	178.52	50.7	112.5	66.02

* Denotes existing Short Spacing under Sect 73.215

** Denotes Fort Bend Rulemaking

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Exhibit 2.1 - Alternate Reference Point

Site Location: 43° 17' 20"NL; 86° 02' 51"WL



Exhibit 2.1a – Supplemental Map of Alternate Reference Point



This map depicting the alternate reference site in relation to the Muskegon State Game Area was taken from the Muskegon Area Chamber of Commerce Website "www.muskegon.org".

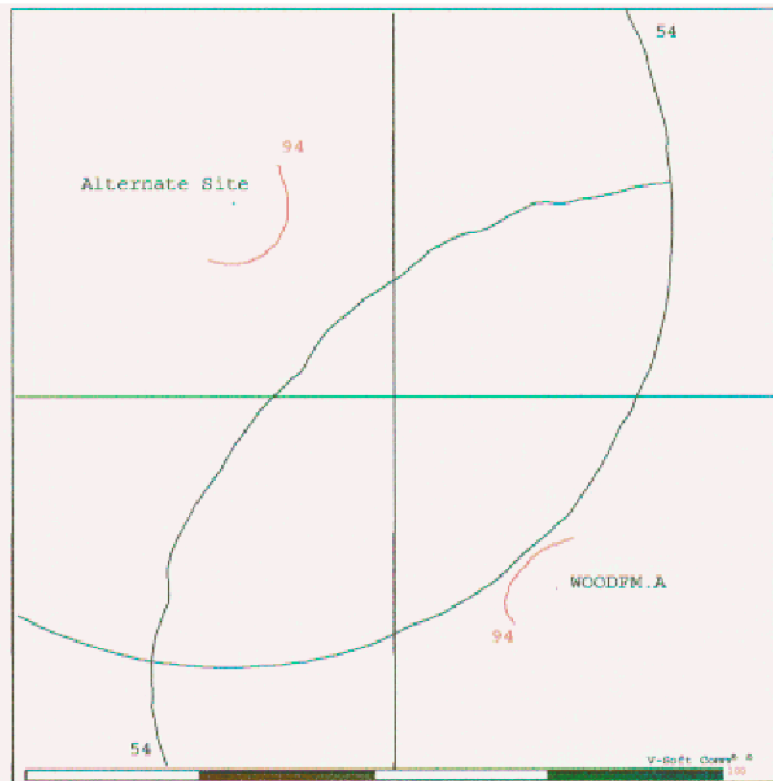
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Exhibit 2.2 - Contour Study with WOOD-FM.A

Alternate Site CH 287 B
50 kW 358M COR
Prot. = 54 dBu
Intef. = 94 dBu

WOODFM.A CH 289 B
50kW, 375 M COR DA
Prot. = 54 dBu
Intef. = 94 dBu

1:1,000,000



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Exhibit 2.3 - Alternate Site Allocation

FMCONTTM LOCATE STUDY

Ch 237 B
105.3 MHz

N. Lat. 43 17 20
W. Lng. 86 02 51



Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
RADD	287B	- ADD	Coopersville	MI	15.54	67.0	240.5	-224.96
WCXT.C	287C2-	CP	Hart	MI	29.01	0.8	240.5	-211.49
WCXT	287C2-	LIC	Hart	MI	45.72	340.3	240.5	-194.78
RDEL	287C2-	DEL	Hart	HI	45.73	340.3	240.5	-194.77
WOODFA*289B	- APP	Grand Rapids	MI	71.42	139.5	73.5	-2.08	
WFZH	287A	- LIC	Mukwonago	WI	177.86	259.1	177.5	0.36
RADD**	287A	- ADD	Glen Arbor	MI	178.78	1.6	179.5	1.28
WOODFM	289B	- LIC	Grand Rapids	MI	79.97	146.7	73.5	6.47
WKHMFM	287A	- LIC	Brooklyn	MI	184.57	132.6	177.5	7.07
WKLQ	233B	- LIC	Holland	MI	48.64	171.8	19.5	29.14
WOJO.C	286B	- CP	Evanston	IL	201.41	220.4	168.5	32.91
WOJO	286B	- LIC	Evanston	IL	201.41	220.4	168.5	32.91
WQBX.C	285A	- CP	Alma	MI	117.31	85.1	68.5	48.81
WQBX	285A	- LIC	Alma	MI	117.31	85.1	68.5	48.81
WWCKFM	288B1-	LIC	Flint	MI	197.37	98.2	144.5	52.87
WAIR.C	285A	- CP	Lake City	MI	121.95	28.7	68.5	53.45
WRLOFM	287C1-	LIC	Antigo	WI	337.08	314.3	269.5	68.38
WBMI	288A	- LIC	West Branch	MI	182.07	51.2	113.5	69.57

* Denotes existing Short Spacing under Sect 73.215

** Denotes Fort Bend Rulemaking

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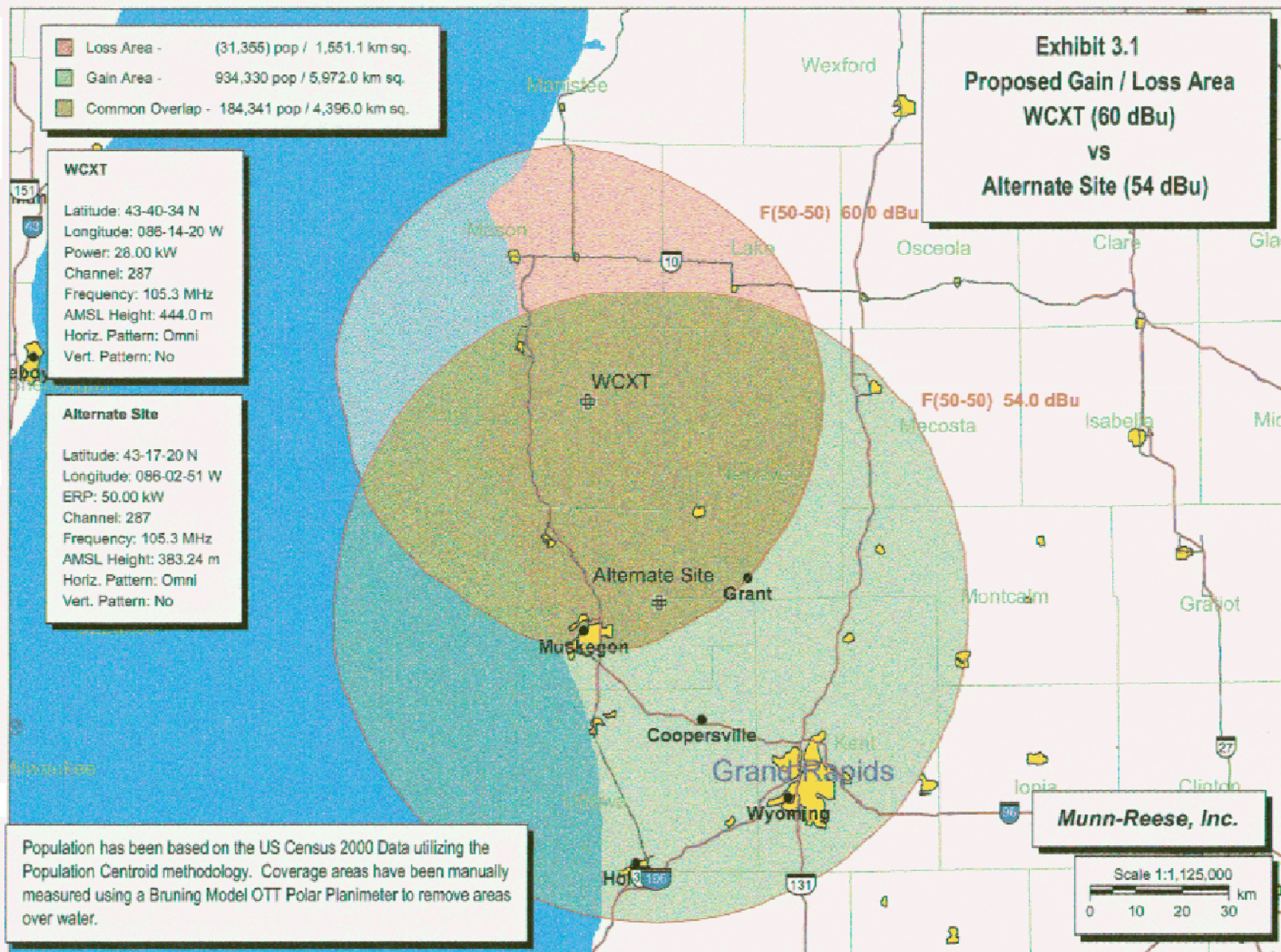


Exhibit 3.2
Alternate Site Service Floor Study
WCXT Loss Area

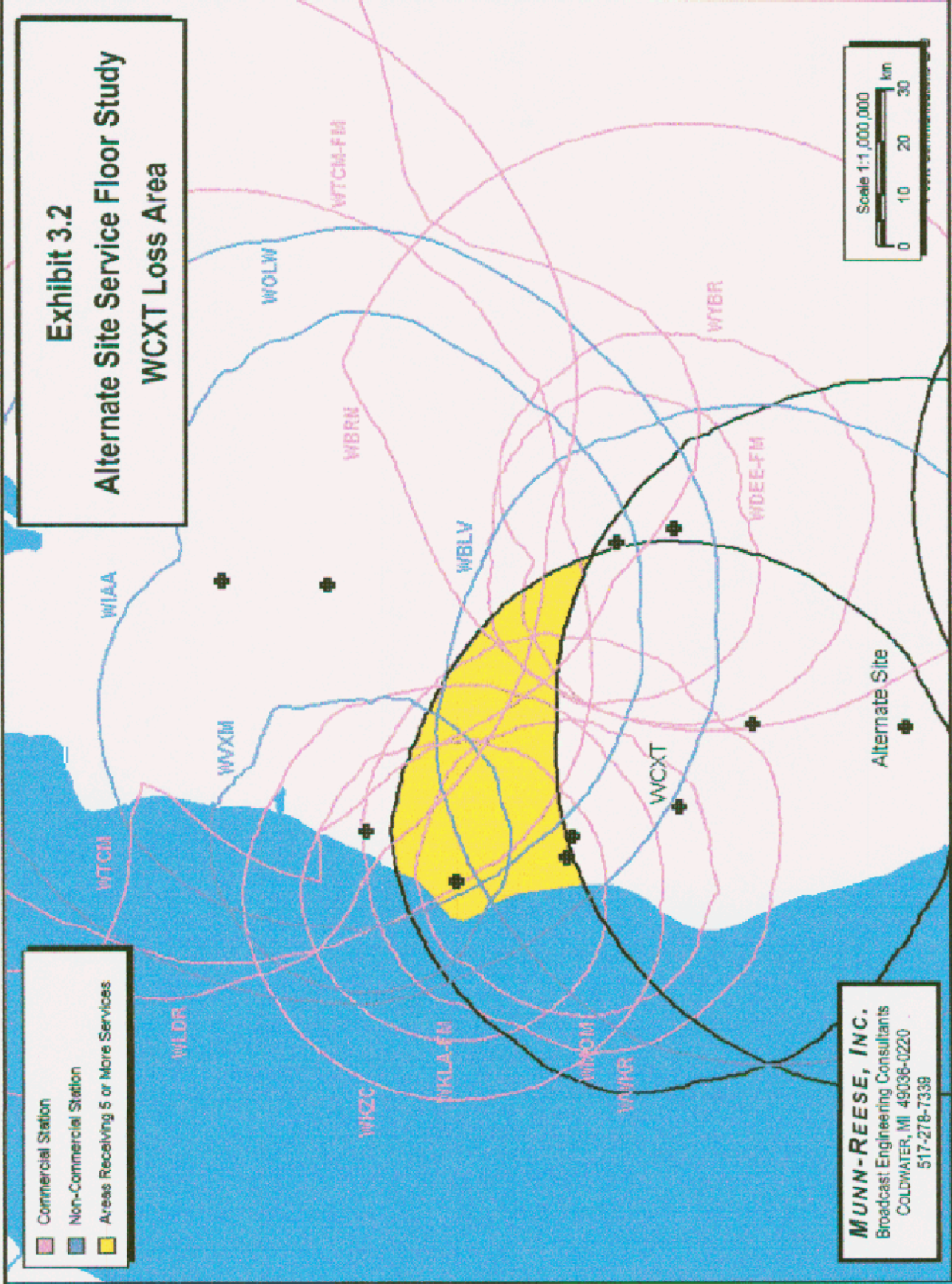


Exhibit 3.2a

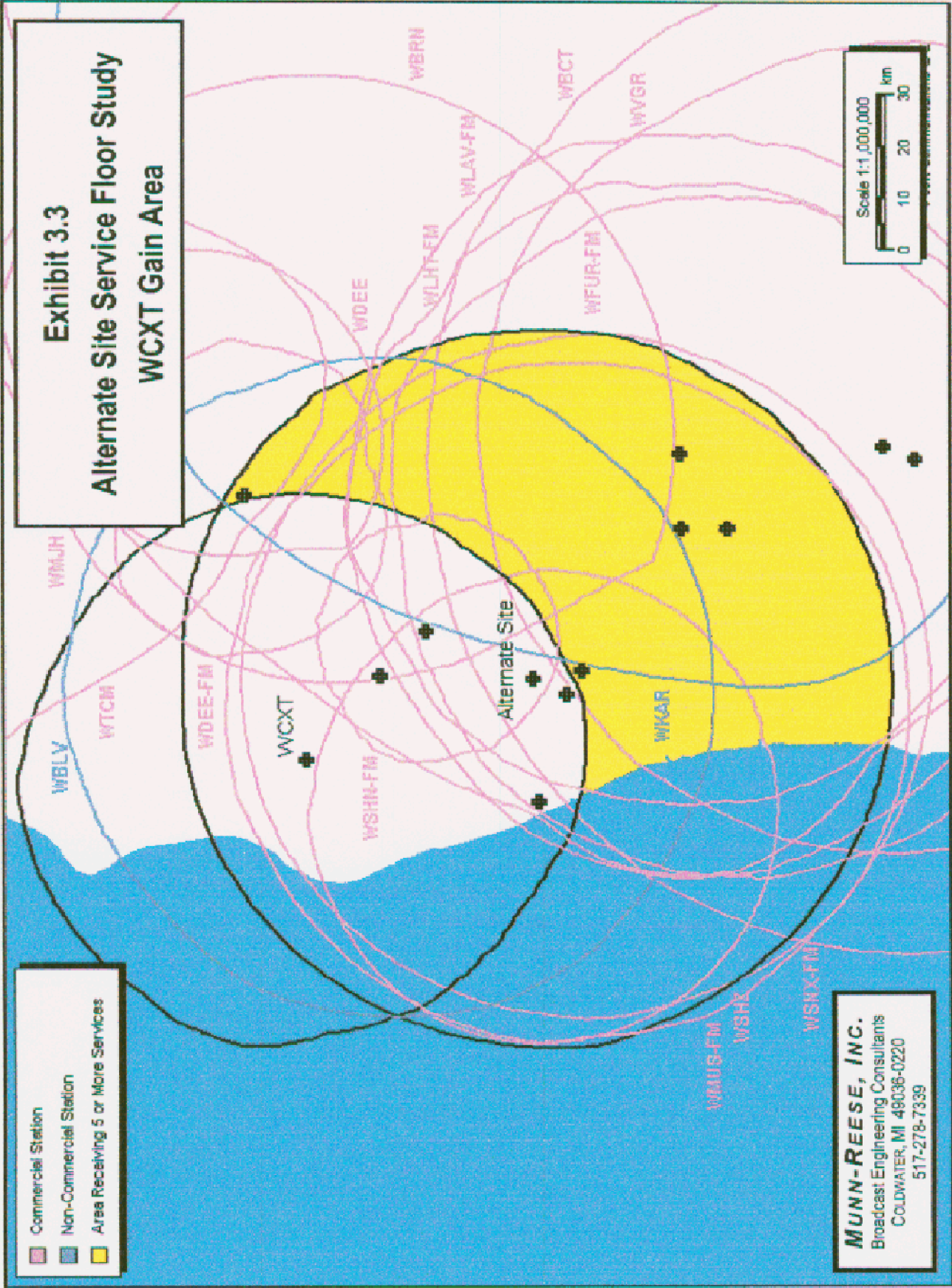
Alternate Site Service Floor Study – Loss Area

Stations Providing Service to Loss Area:

Call	Channel/Frequency	Class/Status	City/State	License No.	Fac. ID	Applicant
WIAA	204 88.7 MHz	C FM LIC	INTERLOCHEN	MI BLED -19900105KB	28887	INTERLOCHEN CENTER FOR THE ARTS
WBLV	212 90.3 MHz	C1 FM LIC	TWIN LAKE	MI BLED -19901002KB	5902	BLUE LAKE FINE ARTS CAMP INC.
WOLW	216 91.1 MHz	C1 FM LIC	CADILLAC	MI BLED -19880502KC	49537	NORTHERN CHRISTIAN RADIO INC.
WWKR	231 94.1 MHz	C3 FM LIC	PENTWATER	MI BLH -19950609KC	7994	SYNERGY MEDIA INC.
WKZC	235 94.9 MHz	C3 FM LIC	SCOTTVILLE	MI BLH -19931022KC	10811	LAKE MICHIGAN BROADCASTING INC.
WDEE-FM	247 97.3 MHz	A FM LIC	REED CITY	MI BLH -19970922KE	63424	STEVEN V. BEILFUSS
WVXM	249 97.7 MHz	A FM LIC	MANISTEE	MI BLED -19960125KF	39787	XAVIER UNIVERSITY
WYBR	272 102.3 MHz	C3 FM LIC	BIG RAPIDS	MI BLH -19921112KE	71629	MENTOR PARTNERS INC.
WMOM	274 102.7 MHz	A FM LIC	PENTWATER	MI BLH -19990927ABJ	76507	BAY VIEW BROADCASTING INC
WKLA-FM	292 106.3 MHz	A FM LIC	LUDINGTON	MI BLH -19931022KD	10809	LAKE MICHIGAN BROADCASTING INC.
WTCM-FM	278 103.5 MHz	C FM LIC	TRAVERSE CITY	MI BLH -19870203KB	70525	WTCM RADIO INC.
WLDR	1210 kHz	D AM LIC	KINGSLEY	MI BL-19980622AD	4599	FORT BEND BROADCASTING COMPANY
WBRN	1460 kHz	B AM LIC	BIG RAPIDS	MI BL-19830909AG	70506	RH COMMUNICATIONS, INC.
WTCM	580 kHz	B AM LIC	TRAVERSE CITY	MI BL-19960904AA	70524	WTCM RADIO, INC.

Stations provided in **Exhibit 3.2** reflect only the minimum required number of facilities needed to provide all portions of the WCXT lost service area with five (5) aural services. A complete listing of all stations which provide more than the minimum five (5) aural services will be supplied to the Commission upon request.

Exhibit 3.3
Alternate Site Service Floor Study
WCXT Gain Area



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Broadcast Engineering Consultants
COLDWATER, MI 49036-0220
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Exhibit 3.3a

Alternate Site Service Floor Study – Gain Area

Stations Providing Service to Gain Area:

Call	Channel/Frequency	Class/Status	City/State	License No.	Fac. ID	Applicant
WBCT	229 93.7 MHz	B FM LIC	GRAND RAPIDS MI	BLH-19800616AK	73606	CLEAR CHANNEL BROADCASTING LICENSES INC.
WSHZ	300 107.9 MHz	B1 FM LIC	MUSKEGON MI	BLH-19970609KB	70635	CLEAR CHANNEL BROADCASTING LICENSES INC.
WSNX-FM	283 104.5 MHz	B FM LIC	MUSKEGON MI	BLH-19880930KC	24644	CLEAR CHANNEL BROADCASTING LICENSES INC.
WDEE-FM	247 97.3 MHz	A FM LIC	REED CITY MI	BLH-19970922KE	63424	STEVEN V. BEILFUSS
WVGR	281 104.1 MHz	B FM LIC	GRAND RAPIDS MI	BLH-19800402AB	66309	THE REGENTS OF THE UNIV. OF MICH.
WBLV	212 90.3 MHz	C1 FM LIC	TWIN LAKE MI	BLED-19901002KB	5902	BLUE LAKE FINE ARTS CAMP INC.
WSHN-FM	261 100.1 MHz	A FM LIC	HOLTON MI	BLH-20010515AAA	73994	NOORDYK BROADCASTING INC.
WMUS-FM	295 106.9 MHz	B FM LIC	MUSKEGON MI	BLH-20000410ACJ	25086	CLEAR CHANNEL BROADCASTING LICENSES INC.
WLHT-FM	239 95.7 MHz	B FM LIC	GRAND RAPIDS MI	BLH-19840120AE	37457	REGENT BROADCASTING OF GRAND RAPIDS INC.
WLAV-FM	245 96.9 MHz	B FM LIC	GRAND RAPIDS MI	BLH-19940822KC	41680	CITADEL BROADCASTING COMPANY
WFUR-FM	275 102.9 MHz	B FM LIC	GRAND RAPIDS MI	BLH-19890911KD	22916	FURNITURE CITY BROADCASTING CORP.
WBRN	1460 kHz	B AM LIC	BIG RAPIDS MI	BL-19830909AG	70506	RH COMMUNICATIONS, INC.
WDEE	1500 kHz	D AM LIC	REED CITY MI	BL-19811008AA	63423	STEVEN V. BEILFUSS
WMJH	810 kHz	D AM LIC	ROCKFORD MI	BL-19960625AF	55300	BIRACH BROADCASTING CORPORATION
WKAR	870 kHz	D AM LIC	EAST LANSING MI	BL-	41684	MICHIGAN STATE UNIVERSITY
WTCM	580 kHz	B AM LIC	TRAVERSE CITY MI	BL-19960904AA	70524	WTCM RADIO, INC.

Stations provided in **Exhibit 3.3** reflect only the minimum required number of facilities needed to provide all portions of the WCXT gain service area with five (5) aural services. A complete listing of all stations which provide more than the minimum five (5) aural services will be supplied to the Commission upon request.

CERTIFICATE OF SERVICE

I, Janice M. Rosnick, do hereby certify that I have on this 15th day of January, 2003, caused to be hand delivered or mailed via First Class mail, postage prepaid, copies of the foregoing **REPLY COMMENTS** to the following:

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Federal Communications Commission
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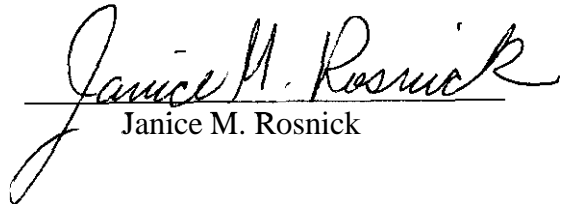
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